

PY2020-2021 ESG Written Standards

The City of Knoxville believes that homelessness is not an acceptable circumstance for anyone in our community. City staff are committed to reducing and preventing homelessness throughout the jurisdiction. Homelessness is a complicated issue and it requires the collaboration of dozens of community partners.

The City of Knoxville is a metropolitan city who received Emergency Solutions Grant (ESG) funds from the U.S. Department of Housing and Urban Development (HUD). These written standards are meant to be used as a guide for City of Knoxville staff and subrecipient agencies.

I. ESG Eligibility Standards

Homeless individuals and families shall be eligible for services supported by the Emergency Solutions Grant. Standard policies and procedures exist for evaluating individuals' and families' eligibility for assistance under the Emergency Solutions Grant. These policies and procedures closely follow HUD's ESG interim rule regulations.

To evaluate an individual or family's eligibility for assistance under ESG, the City and its Subgrantees must document the following, according to HUD regulations:

Homelessness status 24 CFR 576.500 (b) – The City and its Subgrantees maintain and follow written intake procedures to ensure compliance with the homeless definition in §576.2.

At-risk of homelessness status §576.500 (c) – The City and its Subgrantees document evidence relied upon to determine that individuals and families have met the definition of “at risk of homelessness” in §576.2.

Determinations of ineligibility §576.500 (d) – For each individual and family determined ineligible to receive ESG assistance, the records include documentation of the reason for that determination.

Annual income §576.500 (e) – For each family or individual receiving ESG assistance, annual income is documented in order to determine eligibility requirements for the program.

The City and its Subgrantees maintains documentation showing evidence of all participants' eligibility. There are also policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.

Using a thorough intake and assessment process, families and individuals should be referred to housing and services for which they are eligible and which will best meet their needs. To be eligible for services, clients must be homeless or at risk of being homeless. The household's total income must be at 30% area median income (AMI) requirement which falls in line with the Fair Market Rent (FMR) Documentation System for Tennessee.

The household must be either homeless (to receive rapid re-housing assistance) or at risk of losing its housing within 21 days after the date of the application (to receive homelessness prevention assistance). The household must meet the following requirements:

- No appropriate subsequent housing options have been identified;
- The household lacks the financial resources to obtain immediate housing or remain in its existing housing; and
- The household lacks support network to obtain immediate housing or remains in its existing housing. Additional risk factors will be considered in determining eligibility for assistance under ESG.
- Income eligibility must be verified every three months and documented in the case file via paycheck stubs, unemployment check stubs, SSI, pension, child support, etc.

2) Description of CoC (§91.220(l)(4)(ii), §91.320(k)(3)(ii))

The Knoxville-Knox County Homeless Coalition was formed in 1986. This organization meets monthly to bring together homeless shelter, housing, and service agency staff, and it serves as a forum for direct operational coordination. The Coalition's President represents this body on the Mayor's Roundtable on Homelessness (which meets quarterly). The Coalition also serves as the designated HUD Continuum of Care organization, which holds the responsibility for HUD's CoC application process for federal funding. The Coalition delegates the direct coordination of that application process to the City of Knoxville's Office on Homelessness. The Coalition also designates the CoC's official Homeless Management Information System (HMIS) provider, which is the University of Tennessee Social Work Office on Research and Public Service (SWORPS). This agency also operates the CoC's Coordinated Entry System (CHAMP).

Use of SWORPS for intake and assessment creates a "no wrong door" scenario that enables those seeking help to come into the system through any participating provider and, through the intake and assessment process, gain access to the resources that will most appropriately and effectively meet their needs.

All members of the CoC and recipients of ESG funds are required to participate in HMIS and CHAMP with the exception of victim service providers who may use an approved alternative to track client data.

The City of Knoxville contracts with secular and faith-based agencies; however, faith-based subgrantees may not engage in inherently religious activities such as worship, religious instruction or proselytization as part of the ESG funded activities. These activities may be offered separately from ESG activities but they must be voluntary for program participants. The organization may not discriminate against participants based on religion or belief.

3) Process for Making Sub-awards (§91.220(l)(4)(iii), §91.320(k)(3)(iii))

Each year, the City releases a "Request for Proposals" process where organizations and agencies

can submit an application. The applications list the component areas of the ESG program. Prior to the submission of applications, the City holds a Technical Assistance Workshop to review ESG programmatic structure, go over specific questions in the application, and to answer questions.

Upon receiving applications, the City has a staff review team. Each application is rated on how the proposed program fits within the ESG programmatic components and meets a crucial homelessness-based need. Organizations and agencies are then recommended for funding. Contracts are developed which outline expectations, rules, regulations, policies and procedures.

4) Homeless Participation Requirement (§91.220(1)(4)(iv))

The City has a Mayor's Roundtable on Homelessness which is a forum for addressing long-term solutions. This group is diverse, and includes organizations, agencies, civic leaders and a formerly homeless individual. The Knoxville-Knox County Homeless Coalition is a larger entity and has several former homeless individuals, many of whom now work at homeless shelters or human/social service agencies. All of the City's subgrantees have a homeless individual or a former homeless client on either their advisory council or board of directors. The City believes that these individuals provide a wealth of knowledge, and maintains documentation on file to support that this level of interaction occurs.

5) Performance Standards (§91.220(1)(4)(vi), §91.320(k)(3)(v))

There is a performance criteria section in each subgrantee contract. Two components include: (1) Quantifiable Performance Standards (the services an organization or agency will provide); and (2) Quarterly Performance Goal (a numerical projection of what an organization or agency will achieve each quarter).

On a quarterly basis, organizations and agencies submit reports describing services rendered and number of individuals served. The City reviews these reports to measure, validate and verify how services have improved and enhanced the lives of clients in compliance with ESG standards. The City uses this information to assess performance as well to formulate data for year-end reports.

The City uses a Risk Analysis Matrix to determine which subrecipients will receive formal in-person monitoring. The focus of monitoring is:

- (1) To review operations: administrative, financial and programmatic;
- (2) To assess the reliability of internal controls (general management/business practices and procedures);
- (3) To verify contractual and regulatory compliance (city, state and federal);
- (4) To verify that goals and objectives (performance criteria and standards) are met.
- (5) To verify the civil rights requirements are met;
- (6) To test the reliability/validation of invoices and reports (documentation);
- (7) To determine if costs and services are allowable and eligible, and that clientele served is eligible;
- (8) To ensure and assure that the agency has the capacity to carry out the project.

6) Consultation with CoC (§91.220(1)(4)(vi), §91.320(k)(3)(v))

The City requires that all subrecipients participate in and actively use the Knoxville- Knoxville County Homeless Management Information System (“KnoxHMIS”) for client intake, assessment, and service coordination. The only exceptions to this requirement shall be in the areas of domestic violence and legal services as specifically noted by HUD. Subgrantees are also required to participate fully in the Knoxville-Knox County Homeless Coalition and to coordinate with the Knoxville-Knox County Continuum of Care.

7) Eligible ESG Program Categories

The City of Knoxville shall follow the guidance from the U.S. Department of Housing and Urban Development (HUD) and the Tennessee Housing Development Agency (THDA). The following text is taken from THDA’s Written Standards (Updated 10/30/2017).

1. Street Outreach

Essential services to eligible participants provided on the street or in parks, abandoned buildings, bus stations, campgrounds, and in other such settings where unsheltered persons are staying. Staff salaries related to carrying out street outreach are also eligible.

Eligible Program Participants: Unsheltered individuals and families who qualify as homeless under Category 1 of HUD’s Definition of “Homeless”.

Allowable Activities:

a. Engagement. The costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing and rapid re-housing programs. Eligible costs include the cell phone costs of outreach workers during the performance of these activities.

b. Case Management. The cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. Eligible services and activities are as follows: using the centralized or coordinated assessment system as required under § 576.400(d); conducting the initial evaluation required under § 576.401(a), including verifying and documenting eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participants progress; providing information and referrals to other providers; and developing an individualized housing and service plan, including planning a path to permanent housing stability.

c. Emergency Health Services.

(i) Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living.

(ii) ESG funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the area.

(iii) Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate emergency medical treatment; and providing medication and followup services.

d. Emergency Mental Health Services.

(i) Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions operating in community-based settings, including streets, parks, and other places where unsheltered people are living.

(ii) ESG funds may be used only for these services to the extent that other appropriate mental health services are inaccessible or unavailable within the area.

(iii) Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolutions of the problem or improved individual or family functioning or circumstances.

(iv) Eligible treatment consists of crisis interventions, the prescription of psychotropic medications, explanation about the use and management of medications, and combinations of therapeutic approaches to address multiple problems.

e. Transportation. The transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers are eligible, provided that this travel takes place during the provision of services eligible under this section. The costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible. These costs include the following:

(i) The cost of a program participant's travel on public transportation;

(ii) If service workers use their own vehicles, mileage allowance for service workers to visit program participants;

(iii) The cost of purchasing or leasing a vehicle for the Grantee in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle; and

(iv) The travel costs of Grantee staff to accompany or assist program participants to use public transportation.

f. Services to Special Populations. ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a) through (e) of this section. The term victim services means services that assist program participants who are victims of domestic violence, dating

violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, and sexual assault, or stalking.

Under Street Outreach Services, ESG funds may not be used for the following:

- a. Emergency medical and/or mental health services accessible or available within the area under an existing program; and
- b. Maintenance of existing services already being provided within the past 12 months prior to funding.

2. Emergency Shelter

Funds may be used to cover the costs of providing essential services to homeless families and individuals in emergency shelters and operational expenses of emergency shelters.

Eligible Participants: Individuals and families who qualify as homeless under Categories 1, 2, 3 and 4 of HUD's Definition of "Homeless".

Allowable Activities:

a. Essential Services. This includes services concerned with employment, health, drug abuse, education and staff salaries necessary to provide these services and may include, but are not limited to:

(i) Case Management. The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible. Component services and activities consist of:

(A) Using the centralized or coordinated assessment system as required under §576.400(d);

(B) Conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility;

(C) Counseling;

(D) Developing, securing, and coordinating services and obtaining Federal, State and local benefits;

(E) Monitoring and evaluating program participant progress;

(F) Providing information and referrals to other providers;

(G) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and

(H) Developing an individualized housing and service plan, including planning a path to permanent housing stability.

(ii) Child Care. The costs of child care for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13, unless they are disabled. Children with disabilities must be under the age of 18.

The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

(iii) Education Services. When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED). Component service or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.

(iv) Employment Assistance and Job Training. The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is an eligible cost. Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates. Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and referral to community resources.

(v) Outpatient Health Services. Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals.

Emergency Solutions Grant (ESG) funds may be used only for these services to the extent that other appropriate health services are unavailable within the community. Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate medical treatment, preventive medical care, and health maintenance services; including providing medication and follow-up services; and providing preventive and noncosmetic dental care.

(vi) Legal Services.

(A) Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing.

(B) ESG funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community.

(C) Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.

(D) Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling. (E) Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible.

If the Grantee is a legal services provider and performs the services itself, the eligible costs are the Grantee's employees' salaries and other costs necessary to perform the services.

(E) Legal services for immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

(vii) Life Skills Training. The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness are eligible costs.

These services must be necessary to assist the program participant to function independently in the community. Component life skills training are budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.

(viii) Mental Health Services.

(A) Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions.

(B) ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible within the community.

(C) Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management.

(D) Eligible treatment consists of crisis interventions; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

(ix) Substance Abuse Treatment Services.

(A) Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals.

(B) ESG funds may only be used for these services to the extent that other appropriate substance abuse treatment services are unavailable or inaccessible within the community.

(C) Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.

(x) Transportation. Eligible costs consist of the transportation costs of a program participant's travel to and from medical care, employment, child care or other eligible essential services facilities. These costs include the following:

(A) The cost of a program participant's travel on public transportation;

(B) If service workers use their own vehicles, mileage allowance for service workers to visit program participants;

(C) The cost of purchasing or leasing a vehicle for the Grantee in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle; and

(D) The travel costs of Grantee staff to accompany or assist program participants to use public transportation.

(xi) Services for Special Populations. ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1)(i) through (a)(1)(x) of this section. The term victim services means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

b. Operations. Eligible costs are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

Prohibition against involuntary family separation. The age of a child under age 18 must not be used as a basis for denying any family's admission to an emergency shelter that uses ESG funding or services and provides shelter to families.

Expenditures limits of combined Street Outreach and Emergency Shelter services cannot exceed 60% of the entire ESG allocation. THDA reserves the right to adjust applicants' budgets, if needed, to remain within this requirement.

Under Emergency Shelter Services, ESG may not be used for the following:

- a. Acquisition of real property;
- b. New construction or rehabilitation of an emergency shelter for the homeless;
- c. Property clearance or demolition;
- d. Staff training or fund raising activities;
- e. Salary of case management supervisor when not working directly on participant issues;
- f. Advocacy, planning, and organizational capacity building;
- g. Staff recruitment and/or training
- h. Transportation costs not directly associated with service delivery.
- i. Recruitment or on-going training of staff;

- j. Depreciation;
- k. Costs associated with the organization rather than the supportive housing project (advertisements, pamphlets about the agency, surveys, etc.)
- l. Staff training, entertainment, conferences or retreats;
- m. Public relations or fund raising;
- n. Bad debts or bank fees; and
- o. Mortgage payments.

3. Homelessness Prevention

Activities related to preventing persons from becoming homeless and to assist participants in regaining stability in their current or other permanent housing.

Eligible Participants: Extremely low-income individuals and families with household incomes of at or below 30% of Area Median Income who qualify as homeless under Categories 2, 3 and 4 of HUD's Definition of "Homelessness" or any category of HUD's Definition of "At Risk of Homelessness".

4. Rapid Re-Housing

Activities related to help a homeless individual or family to move into permanent housing.

Eligible Participants: Individuals and families who meet HUD's definition of "Homeless" under Categories 1 and 4.

Allowable Activities for Prevention and Rapid Re-Housing:

a. Financial Assistance – ESG funds may be used to pay housing owners, utility companies, and other third parties for the following costs:

(i) Rental application fees. ESG funds may pay for the rental housing application fee that is charged by the owner to all applicants.

(ii) Security deposits. ESG funds may pay for a security deposit that is equal to no more than 2 months' rent.

(iii) Last month's rent. If necessary to obtain housing for a program participant, the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period.

(iv) Utility deposits. ESG funds may pay for a standard utility deposit required by the utility company for all customers for the utilities listed in paragraph (5) of this section.

(v) Utility payments. ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services are

gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period.

(vi) Moving costs. ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under paragraph (b) of this section and before the program participant moves into permanent housing.

Payment of temporary storage fees in arrears is not eligible.

b. Service Costs. ESG funds may be used to pay the costs of providing the following services:

(i) Housing search and placement. Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing, include the following:

(A) Assessment of housing barriers, needs and preferences;

(B) Development of an action plan for locating housing;

(C) Housing search;

(D) Outreach to and negotiation with owners;

(E) Assistance with submitting rental applications and understanding leases;

(F) Assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness;

(G) Assistance with obtaining utilities and making moving arrangements; and

(H) Tenant counseling.

(ii) Housing stability case management. ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtain housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing. Component services and activities consist of:

(A) Using the centralized or coordinated assessment system as required under §576.400(d) to evaluate individuals and families applying for or receiving homeless prevention or rapid re-housing assistance;

(B) Conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility, for individuals and families applying for homelessness prevention or rapid re-housing assistance.

(C) Counseling

(D) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;

(E) Monitoring and evaluating program participant progress;

(F) Providing information and referrals to other providers;

(G) Developing an individualized housing and service plan, including planning a path to permanent housing stability; and

(H) Conducting re-evaluations required under §576.401(b).

(3) Mediation. ESG funds may pay for mediation between the program participant and the owner of person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.

(4) Legal Services. ESG funds may pay for legal services, as set forth in §576.102(a)(1)(vi), except that the eligible subject matters also include landlord/tenant matters, and the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.

(5) Credit Repair. ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

The Grantee may set a maximum dollar amount that a program participant may receive for each type of financial assistance. The Grantee may also set a maximum period for which a program participant may receive any of the types of assistance or services.

Financial assistance cannot be provided to a program participant who is receiving the same type of assistance through other public sources.

c. Short and Medium Term Rental Assistance Requirements and Restrictions

(i) Compliance with FMR (Fair Market Rents) and Rent Reasonableness.

(ii) For purposes of calculating rent, the rent must equal the sum of the total rent, any fees required for rental (excluding late fees and pet deposits), and, if the tenant pays separately for utilities (excluding telephone) the monthly allowance for utilities as established by the public housing authority for the area in which the housing is located.

(iii) Compliance with minimum habitability standards.

(iv) Tenant based rental assistance means that participants select a housing unit in which to live and receive rental assistance. Project based rental assistance mean that grantees identify permanent housing units that meet ESG requirements and enter into a rental assistance agreement with the owner to reserve the unit and subsidize it so that eligible program participants have access to the unit.

(v) A standard and legal lease must be in place.

(vi) No rental assistance can be provided to a household receiving assistance from another public source for the same time period (with the exception of rental arrears).

(vii) Participants must meet with a case manager at least monthly for the duration of the assistance (participants who are victims of domestic violence are exempt if meeting would increase the risk of danger to client).

(viii) The Grantee must develop an individualized plan to help the program participant remain in permanent housing after the ESG assistance ends.

(ix) The Grantee must make timely payments to each owner in accordance with the rental agreement. The Grantee is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

Under Prevention and Rapid-Rehousing Activities, ESG funds may not be used for the following:

- a. Mortgage loan payments;
- b. Pet deposits;
- c. Late fees incurred if grantee does not pay agreed rental subsidy by agreed date;
- d. Payment of temporary storage fees in arrears;
- e. Payment of past debt not related to rent or utility; and
- f. Financial assistance to program participants who are receiving the same type of assistance through other public sources or to a program participant who has been provided with replacement housing payments under URA during the same time period.

5. Homeless Management Information System (HMIS) Data Collection

Eligible costs include hardware; software; equipment costs; staffing for operating HMIS data collection, monitoring and analysis; reporting to the HMIS Lead Agency; training on HMIS use; and obtaining technical support. Domestic violence agencies may use HMIS funds to pay for costs in obtaining and operating a data collection program comparable to HMIS, including user fees, software, equipment, training, and maintenance.

Under HMIS Data Collection: Grantees that are not compliant with HUD's standards on participation, data collection, and reporting under a local HMIS will not be eligible for reimbursement for HMIS activities.